

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

Plaintiff

v.

Case No.: CCB 10-0163

ROSETTA CHUKWUANI

Defendant

MOTION TO DEFER PAYMENT OF FINES AND PENALTIES DURING
DEFENDANT'S INCARCERATION

Rosetta Chukwuani, by her undersigned counsel, Sherrie T. Howell, files this Motion to Defer Payment of fines and Penalties during her period of confinement and for reasons state as follows:

1. Pursuant to the Judgment of conviction in this matter, the Defendant was ordered to pay an assessment of \$100.00 as well as a fine of \$10,000.00.
2. As a result of her incarceration, the defendant does not have the means or the ability to pay the assessment and fine in this matter.
3. Prior to her incarceration in this matter, the Defendant, was the primary financial support for her family and household because she operated a home based daycare business.
4. At present, her family is struggling to maintain the mortgage and other household bills in that Defendant is incarcerated and without resources to assist her family.
5. Because of the fines and penalties due in this matter, whatever funds/finances the Defendant's family contributes to her, i.e. money

for phone account, commissary, etc..., is immediately seized and applied to the fines and penalties.

Wherefore Defendant respectfully requests that this Court enter an Order to Defer Payment of fines and Penalties during her period of incarceration in this matter.

Respectfully submitted,

/S/ Sherrie T. Howell

Sherrie T. Howell
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of January 2013, a copy of the foregoing Motion for Extension of time to Surrender was forwarded via first class mail, postage prepaid to: Joshua L. Kaul and Mushtaq Gunja, Office of the United State's Attorney for the District of Maryland, 4th Floor, 36 S. Charles Street, Baltimore, Md. 21201.

/S/ Sherrie T. Howell

Sherrie T. Howell